



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

224 South Arthur • Pocatello, Idaho 83204-3202 • (208) 236-6160

Dirk Kempthorne, Governor
C. Stephen Allred, Director

January 23, 2001

CERTIFIED MAIL#

Janice Hardman, EHS/QA Manager
ConAgra Malting
P.O. Box 7
Pocatello, ID 83204

RECEIVED

JAN 30 2001

DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A/Q PROGRAM

**RE: T2-990007, ConAgra Malting, Pocatello
(Tier II Operating Permit No. 005-00035)**

Dear Ms. Hardman:

On December 9, 1999, the Department of Environmental Quality (DEQ) received an application for a Tier II Operating Permit (OP) from ConAgra Malting. On January 13, 2000, the application was declared incomplete. On April 14, 2000, the application was withdrawn. On July 11, 2000, a complete application was received. A public comment period was held from November 22, 2000, to December 22, 2000.

Based on review of the application, and all state and federal rules and regulations, DEQ finds this project meets the provisions of IDAPA 58.01.01.400 (*Rules for the Control of Air Pollution in Idaho*). Therefore, enclosed is your Tier II OP #005-00035 for the emission source identified in the complete application.

You are strongly encouraged to request a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Mr. Richard Elkins of the Pocatello Regional Office will contact you regarding this meeting. DEQ strongly recommends that in addition to your facility's plant manager; your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions also attend the meeting.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Environmental Quality, 1410 North Hilton, Boise, Idaho 83706-1255, within thirty-five (35) days of the date of this decision. However, DEQ encourages you to contact the Air Quality Permit Program to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Richard Elkins at (208) 236-6160.

Sincerely,

Mark Dietrich
Administrator
Pocatello Regional Office

cc: Pocatello Regional Office
Marilyn Seymore, State Air Program
L. Kral, EPA - Region 10

State of Idaho
Department of Environmental Quality

**AIR POLLUTION
OPERATING PERMIT**

GENERAL INFORMATION

PERMIT NUMBER

0 0 5 - 0 0 0 3 5

AQCR

0 6 1

CLASS

S M

SIC

2 0 8 3

ZONE

1 2

UTM COORDINATE (km)

3 7 8 . 6 , 4 7 4 9 . 8

1. PERMITTEE

ConAgra Malt

2. PROJECT

Tier II Operating Permit

3. MAILING ADDRESS

P.O. Box 7

TELEPHONE #

(208) 234-1260

COUNTY

Bannock

4. CITY

Pocatello

STATE

Idaho

ZIP CODE

83201-0007

5. PERSON TO CONTACT

Janice Hardman

TITLE

EHS/QA Manager

6. EXACT PLANT LOCATION

1666 Kraft Road, Pocatello Idaho.

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

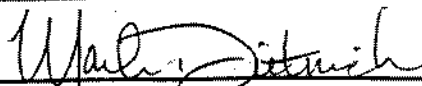
Barley Malting

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 58.01.01.400 and pertains only to emissions of air contaminants which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND THE IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY'S (DEQ) TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEQ REVIEW IN ACCORDANCE WITH SECTION 58.01.01.200 OF THE *RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO*.

DISCLAIMER: This document may serve as a Preliminary Inspection Finding Form for use by Department personnel in communicating your compliance status upon inspection. It does not constitute a final determination of compliance status with the Idaho Code or any rules promulgated, permits issued, or consent or judicial orders entered into pursuant to the law. The Idaho Department of Environmental Quality reserves the right to supplement this document with additional compliance determinations, and amend, change, or otherwise modify any compliance determination stated in this document. This document in no way restricts the state of Idaho, Department of Environmental Quality from taking any action available under law to address past, present, or future violations of the laws administered by the agency.



REGIONAL ADMINISTRATOR

POCATELLO REGIONAL OFFICE

DEPARTMENT OF ENVIRONMENTAL QUALITY

ISSUED DATE January 26, 2001

EXPIRATION DATE January 26, 2006

Permittee: ConAgra Malting
 Project: Tier II Operating Permit
 Location: Pocatello
 Source: Pellet Mill Cooler

PERMIT NUMBER

0	0	5	-	0	0	0	3	5
---	---	---	---	---	---	---	---	---

OR DEQ USE ONLY

[illegible]

1. EMISSIONS LIMITS

1.1 Particulate Emission Limit

Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM-10) emissions from the pellet mill cyclone shall not exceed any corresponding emission rate limit listed in Appendix A of this permit.

1.2 Opacity Limit

Emissions from any stack, vent, or functionally equivalent opening shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required by IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2. OPERATING REQUIREMENTS

2.1 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- 2.1.1 Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
- 2.1.2 Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust;
- 2.1.3 Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- 2.1.4 Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
- 2.1.5 Paving of roadways and their maintenance in a clean condition, where practical; or
- 2.1.6 Prompt removal of earth or other stored material from streets, where practical.

Inspection Comments:

ISSUED DATE:	January 26, 2001
EXPIRATION DATE:	January 26, 2005

Permittee: ConAgra Malting
Project: Tier II Operating Permit
Location: Pocatello
Source: Pellet Mill Cooler

PERMIT NUMBER

0	0	5
---	---	---

-

0	0	0	3	5
---	---	---	---	---

FOR DEQ USE ONLY[illegible]

2.2 Throughput Limits

The pellet mill production rate shall not exceed fifty seven and 6 tenths (57.6) tons per day (ton/day), and twelve thousand (12,000) tons per year (ton/yr) of pellets.

2.3 Control Device

When in operation, the pellet mill cooler must exhaust through a properly operating control device at all times.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 Throughput Monitoring

Each calendar day the pellet mill is operated, the permittee shall monitor and record the pellet mill production rate, in tons per day. At the end of each calendar month, the permittee shall monitor and record the amount of pellets, in tons, produced during the calendar month, and the total amount of pellets, in tons, produced during the previous twelve (12) consecutive months of operation. The most recent two (2) years compilation of data shall be kept on site, and made available to DEQ representatives upon request.

3.2 Operations and Maintenance Manual Requirements

Within sixty (60) days after issuance of this permit, the Permittee shall have developed an Operations and Maintenance (O&M) Manual for the pellet mill cooler cyclone, which describes the procedures that will be followed to comply with General Provision B and the manufacturer's air pollution control device specifications. This manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

4. REPORTING REQUIREMENTS

4.1 Certification of Documents

All documents, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications submitted to DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

Inspection Comments:

ISSUED DATE:	January 26, 2001
EXPIRATION DATE:	January 26, 2005

Page 4 of 7

TA:bm J:AIRPER-1VPRO990007A.PMT

FOR DEQ USE ONLY[illegible]

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures to be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.

Inspection Comments:

ISSUED DATE:	January 26, 2001
EXPIRATION DATE:	January 26, 2005

FOR DEQ USE ONLY

[illegible]

- I. Performance tests (i.e.; air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 16.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior DEQ approval.
- The Permittee shall submit a proposed test date for each performance test required by this permit to DEQ for approval at least fifteen (15) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The Permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.
- Within thirty (30) days of the date on which a performance test required by this permit is concluded, the Permittee shall submit to DEQ a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.
- The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by DEQ, which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.
- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

Inspection Comments:

ISSUED DATE:	January 26, 2001
EXPIRATION DATE:	January 26, 2005